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 Counterclaimant Skyrise, Inc.*

**UNITED STATES DISTRICT COURT
 CENTRAL DISTRICT OF CALIFORNIA**

MOOG INC.,

Plaintiff,

v

SKYRYSE, INC., ROBERT ALIN
 PILKINGTON, MISOOK KIM, and
 DOES NOS. 1-50,

Defendants.

SKYRYSE, INC.,

Counterclaimant,

v

MOOG INC.,

Counterdefendant.

CASE NO. 2:22-cv-09094-GW-
 MAR

**JOINT STIPULATION
 REGARDING DEADLINE TO
 AGREE TO SEARCH TERMS**

Complaint filed: March 7, 2022
 Counterclaims filed: January 30,
 2023

1 IT IS HEREBY STIPULATED by and between Plaintiff and
2 Counterdefendant Moog Inc. (“Moog”) and Defendant and Counterclaimant
3 Skyryse, Inc. (“Skyryse”) (Moog and Skyryse are collectively referred to as the
4 “Parties”) through their respective attorneys of record, as follows:

5 WHEREAS, on June 30, 2023, the Court issued its final ruling (Dkt. 564) (the
6 “Final Ruling”) granting in part and denying in part Moog’s Motion to Enforce
7 Compliance with the March 11, 2022 Stipulated TRO and for Monetary and Adverse
8 Inference Sanctions for Contempt and Spoliation (Dkt. 400);

9 WHEREAS, in the Final Ruling, the Court ordered the Parties to agree to a
10 finalized set of search terms to be run across Skyryse’s Polarion Repository, Git
11 Repository, and Google Drive Account folders by July 31, 2023 (Dkt. 564 at 10);

12 WHEREAS, the Parties require additional time to continue to meet and confer
13 regarding appropriate search terms and searching protocols, and have agreed to a
14 seven-day continuance of the Court’s July 31, 2023 deadline to August 7, 2023,
15 subject to the Court’s approval;

16 WHEREAS, if the Parties are not able to reach complete agreement on all
17 search terms and searching protocols by the continued deadline, the Parties intend
18 to submit a joint report on August 7, 2023 setting forth their respective positions on
19 any outstanding issues;

20 NOW THEREFORE, subject to the Court’s approval, the Parties stipulate and
21 agree that the Parties’ deadline to agree to a finalized set of search terms and
22 searching protocols will be extended by one week from July 31, 2023 to August 7,
23 2023.

24
25 **IT IS SO STIPULATED.**
26
27
28

1 Dated: July 28, 2023

**SHEPPARD, MULLIN,
RICHTER & HAMPTON LLP**

3 By: /s/ Kazim A. Naqvi
4 Kazim A. Naqvi
5 Counsel for Plaintiff and Counter-
6 Defendant Moog Inc.
LATHAM & WATKINS LLP

7 By: /s/ Joseph H. Lee
8 Joseph H. Lee
9 Counsel for Defendant and
10 Counterclaimant Skyrise, Inc.

11 **ATTESTATION**

12 Pursuant to Civil Local Rule 5-4.3.4(a)(2)(i), I, Joseph Lee, attest that
13 concurrence in the filing of this document has been obtained by all signatories.

14 Dated: July 28, 2023

/s/ Joseph H. Lee